

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

NICK QUATTROCIOCCHI, individually and on
behalf of others similarly situated,

Plaintiff,

v.

ROCHESTER INSTITUTE OF TECHNOLOGY,
and other affiliated entities and individuals,

Defendants.

Case No. 6:20-cv-06558

**DECLARATION OF ELLEN
GRANBERG IN SUPPORT OF
ROCHESTER INSTITUTE OF
TECHNOLOGY'S MOTION TO
DISMISS PLAINTIFF'S CLASS
ACTION COMPLAINT**

I, ELLEN GRANBERG, declare:

1. I am the Provost and Senior Vice President for Academic Affairs at Rochester Institute of Technology ("RIT") in Henrietta, New York. In my capacity as Provost and Senior Vice President for Academic Affairs, I have responsibility for the administration, coordination, and development of RIT's educational and research programs and functions across schools and programs, including academic affairs, student retention, academic support programs, and RIT's online programs.

2. The statements in this declaration are made upon my personal knowledge or review of documents in the control, possession, or custody of RIT.

3. Plaintiff Nick Quattrociochi is enrolled as an undergraduate student at RIT. Mr. Quattrociochi remained enrolled at all times during the spring 2020 academic term, completed all courses, and has received credits for each completed class.

4. Each year, each of RIT issues undergraduate and graduate bulletins outlining RIT's policies, including the academic calendar, financial information, academic policies, payment

policies, refund policies, and legal notices (the “RIT Bulletin”). RIT’s policies may also be found on the university website.

5. Attached as **Exhibit A** is a true and correct copy of excerpts of RIT’s Undergraduate Bulletin for the 2019-2020 academic year.

6. Attached as **Exhibit B** is a true and correct copy of RIT’s Student Financial Responsibility Agreement, available at <https://www.rit.edu/fa/sfs/responsibility> .

7. Attached as **Exhibit C** is a true and correct copy of RIT’s Refund/Tuition Adjustment Policies, available at <https://www.rit.edu/fa/sfs/refund>.

8. Attached as **Exhibit D** is a true and correct copy of RIT’s budget Planning Cycle, available at <https://www.rit.edu/fa/budget/content/planning-cycle>.

9. Attached as **Exhibit E** is a true and correct copy of RIT’s website Disclaimer, available at <https://www.rit.edu/disclaimer>.

10. Attached as **Exhibit F** is a true and correct copy of the March 11, 2020 Statement from RIT President Munson: Coronavirus Alters University Schedule, available at <https://www.rit.edu/news/statement-rit-president-munson-coronavirus-alters-university-schedule>.

11. Attached as **Exhibit G** is a true and correct copy of the March 15, 2020 announcement RIT Encourages Students To Not Return To Campus; Courses Resume March 23 Through Alternative Modes, available at <https://www.rit.edu/news/rit-encourages-students-not-return-campus-courses-resume-march-23-through-alternative-modes>.

12. Attached as **Exhibit H** is a true and correct copy of the March 20, 2020 announcement Information Regarding Credits and Refunds, available at <https://www.rit.edu/news/information-regarding-credits-and-refunds>.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed this 1st day of October 2020, in Amherst, New York.



ELLEN GRANBERG